

Subject **Re: Qorrolli v. MDA et al**
 From David C. Wims, Esq. <dwims@wimslaw.com>
 To Zachary Holzberg <zachary@dereksmithlaw.com>
 Cc <derek@dereksmithlaw.com>, <alexc@dereksmithlaw.com>, <alexander.cabeceiras@gmail.com>, <steve@tbulaw.com>, Mark <mark@gilwittlaw.com>
 Bcc <evelyn@tbulaw.com>, <carolinanunez@dereksmithlaw.com>, <dtlaws@msn.com>
 Date 2023-01-20 17:29
 Priority High



- QorrolliOOJ2.pdf (~139 KB)

Zach,

Attached is our most recent offer of judgment. Thanks.

On 2023-01-20 17:12, David C. Wims, Esq. wrote:

I can do anytime Monday. Or, Tuesday after 12 pm. Please let me know if either of those work for you. Thanks and enjoy your weekend!

On 2023-01-20 15:58, Zachary Holzberg wrote:

David,

~~Plaintiff's most recent offer of judgment dated 1/19/23~~

- Letter to ~~Dr. Cohen~~ dated ~~October 12, 2018~~ (Plaintiff 10-11)
- Plaintiff's ~~Psychiatric Records from Dr. Young~~ (Plaintiff 358-380)
- Plaintiff's ~~diary~~ (Plaintiff 498-538)
- Recording ~~"Sexual Assault Interview"~~
- Deposition Transcript of ~~Dr. Young~~
- Text from ~~Dr. Young~~ to Plaintiff
- Her conversations with:
 - ~~Dr. Cohen~~
 - ~~Dr. Young~~
 - ~~Dr. Young~~
 - ~~Dr. Young~~
 - ~~Dr. Young~~
 - ~~Dr. Young~~
 - ~~Dr. Young~~
 - ~~Dr. Young~~

If you wish to discuss, please let me know when you're free next week. I'll be out of the office on Tuesday for a mediation.

Best Regards,

Zack Holzberg, Esq.

*Admitted NY & NJ

DEREK SMITH LAW GROUP, PLLC

Sexual Harassment and Discrimination Lawyers